



P.O. Box 538704 Cincinnati, Ohio 45253-8704 (513) 648-3000

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September 1, 1999

Fernald Environmental Management Project

Letter No. C:SWP(ARWWP):99-0020

Mr. Mann  
Ohio EPA  
P.O. Box 1049  
Columbus, OH 43216-1049

Dear Mr. Mann:


**OHIO ENVIRONMENTAL PROTECTION AGENCY 1999 ANNUAL DISCHARGE FEE**

A letter stating an estimate of average daily flow for the U.S. Department of Energy (NPDES Permit #11000004) was recently sent from your office to the Fernald site. In the letter, the average daily flow for the Fernald Environmental Management Project (FEMP) from May 1, 1998 to October 31, 1998 was listed as 21.48211 MGD. We feel that this average daily flow estimate and the corresponding preliminary fee of \$17,550.00 shown in your letter is incorrect.

The flows reported for Outfall 4001 are average daily flows. The flows from the remaining outfalls do not reflect average daily flows. The figures provided on form 4500 for Outfall 4002 are those measured during overflows of the Stormwater Retention Basin. The flows at Outfalls 4003, 4004, 4005, and 4006 are only required to be measured during the months of June and December per the permit. Though these figures are shown on the MOR forms as average flows, they do not accurately represent the average daily flows at these outfalls. Therefore, in assessing the Annual Discharge Fee, these figures should not be added to the average daily flow found at Outfall 4001. A more accurate representation of the average daily flow at the FEMP is 4.129 MGD. The data and method used to calculate this flow is provided in this letter.

To support this explanation, attached are the May - October, 1998 MORs per your request. If you have any questions, please contact Marlene M. Landrum at 648-4197.

Sincerely,



David J. Brettschneider, Project Manager  
Aquifer Restoration/Wastewater Project

DJB:MML  
Attachments

Mr. Mann

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c: D. J. Carr, Fluor Daniel Fernald, MS52-2  
N. Hallein, EM-42/CLOV  
E. H. Henry, Fluor Daniel Fernald, MS52-5  
W. A. Hertel, Fluor Daniel Fernald, MS52-5  
F. L. Johnston, Fluor Daniel Fernald, MS52-2  
J. D. Kappa, DOE-FEMP, MS45  
M. M. Landrum, Fluor Daniel Fernald, MS52-5  
C. G. Seifert, Fluor Daniel Fernald, MS52-5  
E. P. Skintik, DOE-FEMP, MS45  
T. J. Walsh, MS65-2  
File Record Subject  
AR Coordinator, MS78  
EDC File No. 52700

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## CALCULATION OF AVERAGE DAILY FLOWS

OUTFALL 4001		
MONTH	FLOW (MGD)	NUMBER OF DAYS
May	78.793	31
June	96.028	30
July	135.690	31
August	163.982	31
September	132.227	31
October	135.538	30
Totals	742.258	184

REMAINING OUTFALLS		
DATE	OUTFALL	FLOW (MGD)
June 10, 1998	4003	10.873
June 11, 1998	4004	0.538
June 10, 1998	4005	1.229
June 10, 1998	4006	4.313
July 20, 1998	4002	0.550
Totals		17.503

Average Daily Flow Calculations:

$$\begin{array}{r}
 742.258 \text{ MGD} \\
 + 17.503 \text{ MGD} \\
 \hline
 759.761 \text{ MGD}
 \end{array}$$

$$759.761 \div 184 = 4.129 \text{ MGD}$$

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